

EXHIBIT 7

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK

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	:	
BLACK LOVE RESISTS IN THE RUST, et al.,	:	
	:	
Plaintiffs,	:	
v.	:	Case No. 1:18-cv-00719-CCR
	:	
CITY OF BUFFALO, N.Y., et al.,	:	
	:	
Defendants.	:	
	:	
-----	X	

**PLAINTIFFS' SECOND SET OF REQUESTS FOR PRODUCTION
TO DEFENDANT CITY OF BUFFALO, N.Y.**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs Black Love Resists in the Rust, Dorethea Franklin, Taniqua Simmons, De'Jon Hall, and Jane Doe (collectively, "Plaintiffs"), by their undersigned attorneys, hereby serve the following Second Set of Requests for Production of Documents ("Requests") upon each defendant. Plaintiffs request that, within thirty (30) days of service of these Requests, or on a date mutually agreed to by the parties, each defendant make available for inspection and copying the documents described in Schedule B, in accordance with the definitions and instructions set forth in Schedule A, at the offices of the Western New York Law Center, 237 Main Street, Suite 1130, Buffalo, NY 14203. Plaintiffs reserve the right to serve additional Requests as discovery progresses.

Dated: April 19, 2019

/s/ Claudia Wilner
Marc Cohan
Travis W. England
Claudia Wilner
Britney Wilson

Schedule B

REQUESTS FOR PRODUCTION

50. All Documents and Communications relating to the schedule of the fines and fees imposed by the City of Buffalo and/or the BTVA for violations of (i) the New York State Vehicle and Traffic Law and (ii) Chapter 479 of the Code of the City of Buffalo.

51. All Recommended and Adopted Budgets and Quarterly Gap Statements for the City of Buffalo, including but not limited to Budgets and Statements for the Buffalo Traffic Violations Agency, Buffalo Police Department, Parking Enforcement Division, and Law Department.

52. All Documents and Communications relating to any modification or amendment to the City of Buffalo's laws and ordinances concerning traffic fees and fines since July 2013, including, but not limited to, amendments to Chapter 175 of the Code of the City of Buffalo regarding fees charged by the BTVA.

53. All Documents and Communications relating to the City of Buffalo's and/or the BTVA's implementation, enforcement, and collection of any and all fees referenced in Request 52 above.

54. All Documents and Communications relating to the actual administrative cost to the BTVA and/or the City of Buffalo of the following: (a) allowing a defendant to defer payment; (b) processing a scofflaw/default judgment; (c) processing a default conviction; (d) filing a judgment; (e) processing or responding to a motion to vacate disposition.

55. All Documents and Communications, including drafts and internal emails, relating to the preparation and development of the budgets for the BPD, the BTVA, and any agencies having to do with the towing, impounding, and/or auctioning of vehicles, including but